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Attorneys for Plaintiff,  
**FERNANDO PRADO**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

FERNANDO PRADO, an individual,  
on behalf of himself and all others  
similarly situated,

**Plaintiff,**

V.

MCLANE/SUNEST, INC., a Texas Corporation; and DOES 1 to 100, inclusive,

## Defendants.

Case No.: 2:23-cv-01220-JLS-MAR

The Hon. Josephine L. Staton

## JOINT NOTICE OF SETTLEMENT

1 **TO ALL PARTIES, THEIR ATTORNEYS, AND THE HONORABLE COURT:**

2 **PLEASE TAKE NOTICE THAT** Plaintiffs Fernando Prado (“Plaintiff”),  
3 together with Defendant McLane/SunEast, Inc. (“Defendant”), collectively the “Parties,”  
4 submit the following Notice of Settlement.

5 The Parties have settled this entire action on an individual basis. The Parties are in  
6 the process of preparing the long-form settlement agreement. The Parties anticipate filing  
7 the dismissal papers within 45-60 days and request that the Court vacate all remaining  
8 Scheduling Order dates and/or stay this matter in its entirety.

9  
10 Dated: September 30, 2025

SHEGERIAN & ASSOCIATES, INC.

11  
12 By:   
13 Carney Shegerian  
14 Anthony Nguyen  
15 Erik A. Dos Santos

16  
17  
18 Attorneys for Plaintiff,  
19 FERNANDO PRADO

20  
21 DATED: September 30, 2025

BAKER & HOSTETLER LLP

22  
23 By: /s/ Sylvia J. Kim  
24 Matthew C. Kane  
25 Sylvia J. Kim  
26 Amy E. Beverlin  
27 Kerri H. Sakaue

28  
29  
30 Attorneys for Defendant  
31 McLANE/SUNEAST, INC.

1 **PRADO v. MCLANE/SUNEAST, INC., et al.**

2 **USDC CASE NO.: 2:23-cv-01220-JLS-MAR**

3 **CERTIFICATE OF SERVICE**

4 I am an employee in the County of Los Angeles, State of California. I am over the  
5 age of 18 and not a party to the within action; my business address is 11520 San Vicente  
6 Boulevard, Los Angeles, California 90049.

7 On September 30, 2025, I served the foregoing document, described as **NOTICE OF**  
8 **SETTLEMENT** on all interested parties in this action by placing a true copy thereof in a  
9 sealed envelope, addressed as follows:

10 Matthew C. Kane Amy E. Beverlin Kerri H. Sakaue <b>BAKER &amp; HOSTETLER LLP</b> 1900 Avenue of the Stars, Suite 2700 Los Angeles, CA 90067	11 mkane@bakerlaw.com abeverlin@bakerlaw.com ksakaue@bakerlaw.com
12 Sylvia J. Kim <b>BAKER &amp; HOSTETLER LLP</b> Transamerica Pyramid 600 Montgomery Street, Ste. 3100 San Francisco, California 94111-2806	13 sjkim@bakerlaw.com  <i>Attorneys for Defendants</i> MCLANE/SUNEAST, INC.

14  **(BY MAIL)** I placed such envelope, with postage thereon prepaid, in the United  
15 States mail at Los Angeles, California. I am “readily familiar” with the firm’s  
16 practice of collecting and processing correspondence for mailing. Under that  
17 practice, it would be deposited with the U.S. Postal Service on that same day, with  
18 postage thereon fully prepaid, at Los Angeles, California, in the ordinary course of  
business. I am aware that, on motion of the party served, service is presumed invalid  
if the postal cancellation or postage meter date is more than one day after the date  
of deposit for mailing in this affidavit.

19  **(BY ELECTRONIC MAIL)** I sent such document via electronic mail to the  
20 email(s) noted above.

21  **(BY CM/ECF SYSTEM)** I caused the above-referenced document(s) to be sent by  
22 electronic transmittal to the Clerk’s Office using the CM/ECF System for filing  
23 which generated a Notice of Electronic Filing to the CM/ECF registrants in the case.

24  **(FEDERAL)** I declare, under penalty of perjury under the laws of the United States  
25 that the foregoing is true and correct.

26 Executed on September 30, 2025, at Los Angeles, California.

27   
28 Sydney Townes